

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 3:23-md-03084-CRB (LJC)

**DECLARATION OF SARAH R. LONDON IN
SUPPORT OF PLAINTIFFS' POSITION IN
THE JOINT LETTER REGARDING GUS
FULDNER DEPOSITION**

This Document Relates to:

ALL MATTERS

Judge: Hon. Lisa J. Cisneros
Courtroom: G - 15th Floor

DECLARATION OF SARAH R. LONDON IN SUPPORT OF PLAINTIFFS' POSITION IN
THE JOINT LETTER REGARDING GUS FULDNER DEPOSITION
Case No. 3:23-md-03084-CRB (LJC)

I, Sarah R. London, declare:

1. I am an attorney in the law firm of Girard Sharp, LLP, appointed Co-Lead and Liasion Counsel for Plaintiffs in the above-captioned Multi-District Litigation. I am a member of the State Bar of California and am admitted to practice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. Attached as **Exhibit A** is a true and correct copy of excerpts of the rough transcript of the March 27, 2025 deposition of Gus Fuldner.

3. Attached as **Exhibit B** is a true and correct copy of a document introduced as Exhibit 441 to the March 27, 2025 deposition of Gus Fuldner. A copy with the exhibit stamping is not yet available.

4. Attached as **Exhibit C** is a true and correct copy of excerpts of the rough transcript of the March 26, 2025 deposition of Gus Fuldner.

5. In preparing to depose Mr. Fuldner, my team reviewed the deposition of him taken in *Boston Retirement System v. Uber Technologies, Inc., et al.*, No. 3:19-CV-06361-RS. The *Boston Retirement* deposition did not narrow the necessary scope of Mr. Fuldner's deposition in this matter.

I declare under penalty of perjury that the foregoing is true and correct.

Executed this 1st day of April, 2025 in Las Vegas, Nevada.

/s/ Sarah R. London

Sarah R. London